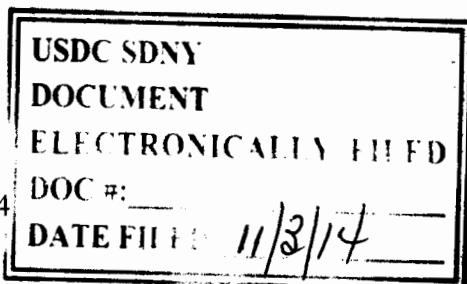


# KING & SPALDING

October 31, 2014

VIA ECF



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Hon. Louis L. Stanton, United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Broadcast Music, Inc. v. Pandora Media, Inc.*, No. 13-CIV-4037 (LLS)

Dear Judge Stanton:

As Your Honor knows, based on the discussion at the conference on October 22, 2014, we were scheduled to file a submission today addressing the relief Pandora seeks in connection with the partial summary judgment motion it has requested leave to file. We just received word this morning from BMI that there has been a significant change in circumstances that BMI feels moots Pandora's need to pursue its summary judgment motion at this time. In light of these developments, BMI advised Pandora that: "[T]here is no imminent publisher withdrawal at the end of 2014. Accordingly, there is no pressing need for summary judgment briefing before year end."

We would like an opportunity to evaluate this new information in order to determine how it affects the relief Pandora was intending to seek. Accordingly, with the Court's permission, we would like to have until next Wednesday, November 5th, to make any submission regarding what, if any, relief remains ripe for consideration at this juncture in the case. BMI counsel has no objection to our request to defer any such submission until November 5th and we do not object to a corresponding extension of their deadline to respond until November 19th.

Respectfully submitted,

/s/  
Kenneth L. Steinhalt

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Louis L  
Stanton  
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cc: Counsel for BMI, Universal Music Publishing Group and Sony/ATV Music Publishing